

# PINE TELEPHONE SYSTEM, INC.

## HEADQUARTERS

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## CORPORATE OFFICE

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February 29, 2012

***Via Overnight Delivery to:  
9300 East Hampton Drive  
Capitol Heights, MD 20743***

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**Re: Annual CPNI Certification; EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed for filing you will find the original and 4 copies of Pine Telephone System, Inc.'s Annual CPNI Certification; EB Docket No. 06-36. I have also enclosed the first page only of the filing for verification of receipt by the FCC. Please date it and return it to the corporate office in the enclosed, self-addressed stamped envelope provided for your convenience.

Thank you for your assistance.

Sincerely,



John B. Hemphill, Vice President  
Pine Telephone System, Inc.

JBH/jl  
Enclosure(s)

No. of Copies 0+4  
List ABCDE

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 29, 2012

Name of company covered by this certification: Pine Telephone System, Inc.

Form 499 Filer ID: 801174

Name of signatory: John B. Hemphill

Title of signatory: Vice-President

**CERTIFICATION OF COMPLIANCE**

I, John B. Hemphill, being of lawful age and duly sworn, on my oath state that I am the Vice President of Pine Telephone System, Inc. and as agent for Pine Telephone System, Inc. state that I am authorized to execute this certification on behalf of Pine Telephone System, Inc., and that in that capacity and based upon my personal knowledge the facts set forth in this certification are true to the best of my knowledge, information and belief. On that basis I certify that Pine Telephone System, Inc. ("Pine") has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR §64.2001 et. seq.

This certification explains how the operating procedures of Pine Telephone System, Inc. are in compliance with 47 CFR §64.2001 et. seq. and is filed pursuant to 47 CFR §64.2001, et seq. and to 47 CFR §64.2009(e).

Pine Telephone System, Inc. uses CPNI only in compliance with 47 CFR §64.2005. Personnel employed in the company's marketing and billing sections are provided with an explanation of what information may be shared in order for Pine to market services to customers and what information may not be shared pursuant to 47 CFR §64.2005. Pine does not disclose any CPNI to any third party for marketing purposes.

Pine does not provide CPNI under the notice and approval procedure set forth in 47 CFR §64.2007 for broader use of CPNI. No CPNI is released over the telephone in a customer-initiated call, but only in a telephone call initiated by the company to the customer at the telephone number of record in the company's accounts, pursuant to 47 CFR §64.2010(b).

Because of the specific procedures of Pine Telephone System, Inc. which do not allow for customer initiated telephone or online access to CPNI, in 2011 there have been no instances of attempted access by data brokers or actions by the company against data brokers.

For 2011, Pine did not receive any customer complaints concerning the unauthorized release of CPNI.

A statement explaining how the operating procedures of Pine Telephone System, Inc. ensure that it is in compliance with these rules of the FCC is attached and includes the items required to be reported under 47 CFR §64.2009(e).

PINE TELEPHONE SYSTEM, INC.

By: John B. Hemphill

Its: Vice President

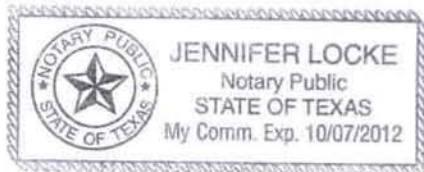
Date: February 29, 2012

Form 499 Filer ID: 801174

State of Texas                   §  
   §  
County of Tom Green       §

On this \_\_\_\_ day of February, 2012, before me, the undersigned, a Notary Public in and for the State of Texas, duly commissioned and sworn, personally appeared John B. Hemphill, to me known to be the Vice President of Pine Telephone System, Inc., the corporation that executed the within and foregoing instrument, and acknowledged said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument, and that the seal affixed is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed that day and year first above written.



Jennifer Locke  
Jennifer Locke

Notary Public in and for the  
State of Texas,  
residing at Tom Green County.  
My commission expires October 7, 2012.

Attachments: Exhibit A "Pine Telephone System, Inc. Compliance Explanation"

**EXHIBIT A**  
**PINE TELEPHONE SYSTEM, INC.**  
**COMPLIANCE EXPLANATION**

Pine Telephone System, Inc. ("Pine") uses the following safeguards and procedures to protect the customer proprietary network information ("CPNI") of Pine's customers.

Pine's company policy is that no account information is released on any customer-initiated or third-party-initiated telephone call. The only way Pine CPNI is released is (a) through a telephone call initiated by Pine to the customer at the telephone number of record for that respective customer, (b) through sending information to the customer at the address for the telephone number of record or (c) through disclosure in person to the customer after satisfactory verification of identity by photo I.D. Pine sends out an annual notice to all its customers that explains what CPNI is, how it is protected, and how the customers may obtain their CPNI from Pine.

No online account access is provided to customer accounts. No CPNI is released to any person through any password system.

All employees of Pine have attended a web training seminar on how to protect CPNI. The seminar was provided by a telecommunications consultant, Consortia.

Pine does not use or disclose to any other persons any CPNI for sales or marketing campaigns. Thus, because there have been no disclosures of CPNI to third parties or allowed access to third parties for sales or marketing, there are no records of disclosures.

Pine's accountant, Bruce Goslovich, Pine's auditor, Moss Adams and Pine's contract billing company, MACC, have been advised of the restrictions on disclosure of CPNI, and have signed certifications that they have made no disclosures of any CPNI acquired while working for Pine Telephone.

Pine does not engage in any outbound marketing operations utilizing CPNI. There are no sales personnel in Pine who release any CPNI for any outbound marketing request.

Pine has an express disciplinary process in place for unauthorized disclosures. Any employee who violates the rules against unauthorized disclosure of CPNI is subject to disciplinary action, specifically loss of a day's pay for each occurrence and possible termination of employment. This is contained in the compliance manual of Pine on CPNI.